

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

STEVEN DRZYMALA,

Plaintiff,

v.

BAE SYSTEMS ORDNANCE SYSTEMS,
INC.,

Defendant.

Civil Action No. 7:21-cv-00522

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiff Steven Drzymala and Defendant BAE Systems Ordnance Systems, Inc. (“BAE OSI”), by counsel, submit this motion for a limited extension of the discovery period and state the following:

1. Plaintiff is a former employee of BAE OSI, and alleges age discrimination with respect to the termination of his employment in January 2021.
2. The Court entered a Scheduling Order in this matter on October 18, 2022. [ECF No. 30] Pursuant to the Scheduling Order, the deadline to complete discovery is May 25, 2023.
3. The Parties have completed written discovery and document productions, as well as the deposition of Plaintiff, during the discovery period.
4. Plaintiff recently requested the depositions of two current BAE OSI employees, Jennifer Majdanik and Timothy Arrowsmith. The witnesses were not available for deposition prior to the current discovery deadline.

5. After conferring with counsel for Plaintiff, BAE OSI has agreed to produce the witnesses for depositions on May 30, 2023. The parties agree that the depositions shall be limited to one-hour in length.

6. Based on the limited nature of the proposed discovery extension, the Parties do not seek modification of any other deadline in the Scheduling Order.

7. All parties join in this motion and neither the parties nor the Court will be prejudiced by the proposed limited extension.

8. Therefore, for the reasons outlined above, the Parties respectfully request the Court enter the attached Order extending discovery until May 30, 2023.

DATED: May 25, 2023

Respectfully submitted,

By: /s/ Thomas Strelka (w/permission)
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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 25, 2023, a true and correct copy of the foregoing Joint Motion to Extend Discovery Deadline was filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to the following:

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